



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

June 29, 2023

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

The Securities and Exchange Commission (“SEC”) or (“the Commission”) writes to submit a proposed order for the release from incarceration of Defendant Edward Bronson (“Defendant”) and for entry of a payment plan order as to Edward and Dawn Bronson.

As background, this Court ordered Defendant incarcerated for civil contempt based on his repeated violations of the Court’s Orders. Most recently, the SEC opposed Defendant’s release before Defendant took certain steps including providing accountings. Defendant has now provided a summary accounting and agreed to amend the accountings as necessary and verify in writing to the SEC that the accountings are complete within 5 business days of his release. Further, Defendant contends in a sworn statement that he has depleted his assets and has no income.

Defendant has also agreed to other things long sought by the SEC in this case including a payment plan, providing a reasonable budget, providing financial transparency, the turnover of certain funds sought by the SEC, and other financial undertakings. Defendant has agreed to work with the SEC to resolve open issues or to seek the Court’s intervention.

Finally, and significantly, Defendant consents to a finding of contempt in connection with additional violations of the Court’s orders and the penny stock bar imposed in the Court’s Final Judgment.

Accordingly, the SEC respectfully requests that the Court release Defendant Edward Bronson from incarceration for civil contempt and enter the proposed payment plan order.

Respectfully submitted,  
*s/ Maureen Peyton King*